

September 23, 2016

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Ms. Jocelyn Boyd  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
Synergy Business Park, The Saluda Building  
101 Executive Center Drive  
Columbia SC 29210

Re: Application of Sandhill Connexions, LLC for Authority to Provide  
Facilities-Based and Resold Local Exchange and Interexchange Internet  
Protocol Voice Services Within Certain Areas of the State of South  
Carolina  
Docket No. 2016-311-C

Dear Ms. Boyd:

Please find enclosed for filing on behalf of the South Carolina Telephone  
Coalition (the "Coalition"), a Petition to Intervene in the above-referenced  
docket. By copy of this letter and Certificate of Service all parties of record will  
receive a copy of this Petition to Intervene via the U. S. Postal Service.

Thank you for your assistance.

Very truly yours,

McNAIR LAW FIRM, P.A.

Sincerely,

McNAIR LAW FIRM, P.A.



Margaret M. Fox

MMF:khh

Enclosure: as stated

McNAIR LAW FIRM, P.A.  
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BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2016-311-C

Re: Application of Sandhill Connexions, LLC	)	
for Authority to Provide Facilities-Based	)	
and Resold Local Exchange and	)	<b>PETITION TO INTERVENE</b>
Interexchange Internet Protocol Voice	)	
Services Within Certain Areas of the State	)	
of South Carolina	)	

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In response to the Commission's Notice of Filing of the Application of Sandhill Connexions, LLC ("Sandhill") for a Certificate of Public Convenience and Necessity to provide local exchange telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission. A list of companies on whose behalf the SCTC is intervening in this matter is attached hereto as "Exhibit A."

2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.

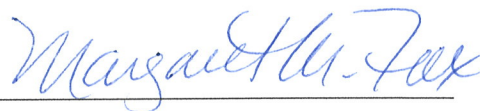
3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.  
Margaret M. Fox  
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Post Office Box 11390  
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By: 

Attorneys for Intervenor South Carolina  
Telephone Coalition

September 23, 2016

Columbia, South Carolina

## EXHIBIT A

### South Carolina Telephone Coalition Member Companies for Purposes of Local Service Stipulation

Chesnee Telephone Company  
Chester Telephone Company, d/b/a TruVista  
Comporium, Inc. (f/k/a Rock Hill Telephone Company)  
Farmers Telephone Cooperative, Inc.  
Ft. Mill Telephone Company, d/b/a Comporium  
Home Telephone ILEC, LLC d/b/a Home Telecom  
Lancaster Telephone Company, d/b/a Comporium  
Lockhart Telephone Company, d/b/a TruVista  
McClellanville Telephone Company (TDS)  
Norway Telephone Company (TDS)  
Palmetto Rural Telephone Cooperative, Inc.  
Piedmont Rural Telephone Cooperative, Inc.  
PBT Telecom, d/b/a Comporium  
Ridgeway Telephone Company, d/b/a TruVista  
St. Stephen Telephone Company (TDS)  
West Carolina Rural Telephone Cooperative, Inc.  
Williston Telephone Company (TDS)

BEFORE  
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Docket No. 2016-311-C


Re:    Application of Sandhill Connexions, LLC    )  
      for Authority to Provide Facilities-Based and    )  
      Resold Local Exchange and Interexchange    )  
      Internet Protocol Voice Services Within    )  
      Certain Areas of the State of South Carolina    )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

I, Kathy Handrock, Paralegal for McNair Law Firm, P.A., do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following parties of record by causing said copies to be deposited in the United States Mail, First Class, postage prepaid to:

Carrie L. DeVier, Esquire  
Donald L. Herman, Jr., Esquire  
Robin E. Tuttle, Esquire  
Herman & Whiteaker, LLC  
6750-B Rockledge Dr., Ste. 150  
Bethesda MD 20817

C. Lessie Hammonds, Esquire  
Jenny R. Pittman, Esquire  
Office of Regulatory Staff  
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Columbia, South Carolina 29201

  
\_\_\_\_\_  
Kathy Handrock, Paralegal  
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Post Office Box 11390  
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Columbia, South Carolina